



William L. Roughton, Jr.

*Vice President
Legal & Regulatory Affairs*

February 26, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Centennial USVI Operations Corp. d/b/a Centennial

Dear Secretary Dortch:

Enclosed please find our Annual CPNI Certification and Statement Concerning Procedures Ensuring Compliance with CPNI Regulations.

Should you have any questions or need additional information, please contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. Roughton, Jr.", with a stylized, cursive script.

William L. Roughton, Jr.
Vice President Legal & Regulatory Affairs

Enclosures

cc: Federal Communications Commission,
Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Centennial USVI Operations Corp. d/b/a Centennial

Form 499 Filer ID: 822328

Name of signatory: Carlos Blanco

Title of signatory: President, Centennial USVI Operations Corp.

I, Carlos Blanco, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



Carlos Blanco

President, Centennial USVI Operations Corp.

STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE WITH CPNI REGULATIONS

The operating procedures and practices of Centennial USVI Operations Corp. d/b/a Centennial (“Centennial USVI”) ensure that Centennial USVI complies with the Commission’s rules at 47 C.F.R. § 64.2001, *et seq.*, governing the use of customer proprietary network information (“CPNI”). Compliance with such rules is demonstrated by the policies and practices employed by Centennial USVI, a brief explanation of which is provided below.

First, Centennial USVI only provides one category of services to its customers—commercial mobile radio service or “CMRS” and it does not use any CPNI in the marketing of its services. Centennial USVI’s services are sold through advertisements and personal contact with customers and potential customers visiting sales locations. (Should Centennial USVI expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer’s CPNI approval prior to any use of, disclosure of or permitting access to its customers’ CPNI.)

Second, Centennial USVI does not disclose CPNI to, or permit access to CPNI, by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the CMRS service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are given access to CPNI are only given access to appropriate CPNI for the third party’s purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid subpoena, court order, etc.

Third, Centennial USVI employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

1. Centennial USVI provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled “Code of Conduct.” The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information.

2. Centennial USVI has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.

3. Centennial USVI maintains records of those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena), which are retained for at least one year.